

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

RICHMOND DIVISION	
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US BANKRUPTCY COURT	

In re: : CHAPTER 11
: Case No. 08-35653 (KRH)
CIRCUIT CITY STORES, INC., et. al., :
: Debtors. : Jointly Administered

X

CREDITOR FORSYTH COUNTY TAX COLLECTOR'S RESPONSE TO
LIQUIDATING TRUST'S EIGHTEENTH OMNIBUS OBJECTION TO CLAIMS
FILED BY TAXING AUTHORITIES (REDUCTION OF CERTAIN PARTIALLY
INVALID CLAIMS; DISALLOWANCE OF CERTAIN INVALID CLAIMS;
DISALLOWANCE OF CERTAIN DUPLICATE CLAIMS; RECLASSIFICATION
OF CERTAIN CLAIMS; DISALLOWANCE OF CERTAIN AMENDED OR
SUPERSEDED CLAIMS; DISALLOWANCE OF CERTAIN LATE FILED
CLAIMS; DISALLOWANCE OR REDUCTION OF CERTAIN INVALID
CLAIMS; AND FIXING THE AMOUNT OF CERTAIN CLAIMS

The Forsyth County Tax Collector by and through its attorney hereby objects to the proposed claim treatment of it at proposed by the Liquidating Trust. In support of this objection it is prepared to show the court as follows;

- a. The claimant is the Forsyth County, North Carolina ("the County") and the Forsyth County Tax Collector charged with the duty of assessing and collecting ad valorem taxes for the County and other political subdivisions of the County.
- b. The claimant has filed a proof of claim in the above-referenced matter for \$3,806.52 for personal property tax owed the County by Circuit City Stores, Inc. The amount of personal property upon which the taxes were assessed was evaluated on equipment only and set by the tax payer. No appeal was made there from by Circuit City Stores, Inc ("CCS"). This means CCS accepted the assessed taxes and subsequently issued taxes due.
- c. A copy of all relevant tax bills have been attached to the proof of claim filed herein and by referenced are incorporated herein.

Wherefore, the respondent County objects to the proposed treatment of its claim as proposed by the Liquidating Trustee and request a Hearing on all issues raised by the proposed treatment and this Objection.

This the 6 day of April, 2011.

MEADOWS & ADERHOLD, P.A.


John A. Meadows (NC State Bar No. 13237)
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Counsel for Forsyth County Tax Collector

CERTIFICATE OF SERVICE

The undersigned attorney for the Forsyth County Tax Collector hereby certifies
That on this day the foregoing Response was served upon the parties listed below by depositing a
copy thereof UPS overnight delivery and addressed as follows:

Lynn L. Tavenner, Esq.
Paula S. Beran, Esq.
20 North Eighth Street, 2nd Floor
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Jeffrey N. Pomerantz, Esq.
Andrew W. Caine, Esq.
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780 Third Ave., 36th Floor
New York, NY 10017

This the 6 day of April, 2011.

MEADOWS & ADERHOLD, P.A.

By: 

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April 6, 2011

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United States Bankruptcy Court
Attn: Clerk of the Bankruptcy Court
701 East Broad Street, Rm 4000
Richmond, VA 23219

RE: In re: Circuit City Stores, Inc.; Chapter 11/Case No. 08-35653 (KRH)

To Whom It May Concern:

Enclosed please find Forsyth County Tax Collectors' Response to Ojection

Sincerely,
MEADOWS & ADERHOLD, P.A.


Kimberly S. Hicks

Paralegal

Enclosure